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Attorneys for Defendants EPSON IMAGING  
DEVICES CORPORATION and EPSON  
ELECTRONICS AMERICA, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Master File No.: 3:07-MD-1827-SI  
Case No. 09-cv-5840-SI  
MDL No. 1827

This Document Relates to:

*Motorola Mobility, Inc. v. AU Optronics  
Corporation, et al., C 09-5840 SI*

**STIPULATION AND ~~[PROPOSED]~~  
ORDER ON BRIEFING SCHEDULE  
FOR SUMMARY JUDGMENT  
MOTION ADDRESSING  
PLAINTIFF'S CLAIMS FOR  
INJURIES IN FOREIGN MARKETS**

1 The undersigned counsel, on behalf of Plaintiff Motorola Mobility, Inc. (“Motorola”) and  
 2 defendants AU Optronics Corporation and AU Optronics Corporation America, Chi Mei  
 3 Corporation, Chimei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co.,  
 4 Ltd., Nexgen Mediatech, Inc. and Nexgen Mediatech USA, Inc., Chunghwa Picture Tubes, Ltd.  
 5 and Tatung Company of America, Epson Imaging Devices Corporation and Epson Electronics  
 6 America, Inc., HannStar Display Corporation, LG Display America, Inc. and LG Display Co.,  
 7 Ltd., Philips Electronics North America Corporation, Samsung Electronics Co., Ltd., Samsung  
 8 Semiconductor, Inc., and Samsung Electronics America, Inc., Samsung SDI Co., Ltd. and  
 9 Samsung SDI America, Inc., Sanyo Consumer Electronics Co., Ltd., Sharp Corporation and  
 10 Sharp Electronics Corporation, and Toshiba Corporation, Toshiba Mobile Display Co., Ltd.,  
 11 Toshiba America Electronic Components, Inc. and Toshiba America Information Systems, Inc.  
 12 (“Defendants”), parties to the above-entitled action, hereby stipulate as follows:

13 WHEREAS Defendants will file a Joint Motion for Summary Judgment addressing  
 14 Plaintiff’s claims for injuries in foreign markets under the Foreign Trade Antitrust Improvement  
 15 Act (the “Motion”);

16 WHEREAS the Motion involves issues of fact and law that cannot be adequately  
 17 presented in 25 pages;

18 WHEREAS Motorola and Defendants have agreed that an orderly schedule of the briefing  
 19 would be most efficient for the Court and the Parties;

20 THEREFORE the Parties agree as follows:

- 21 1. Defendants shall submit the Motion by April 4, 2012. The page limit for the  
 22 Memorandum in support of the Motion shall be 35 pages.
- 23 2. Motorola shall submit its Opposition to the Motion by May 18, 2012. The page  
 24 limit for the Opposition shall be 45 pages.
- 25 3. Defendants shall submit a Reply by June 15, 2012. The page limit for the Reply  
 26 shall be 30 pages.
- 27 4. The Motion shall be heard on July 13, 2012, or at such time as the Court may  
 28 choose.

1 Dated: March 27, 2012

MELVIN R. GOLDMAN  
STEPHEN P. FRECCERO  
DEREK F. FORAN  
MORRISON & FOERSTER LLP

By: /s/ Derek F. Foran

DEREK F. FORAN

*Attorneys for Defendants  
Epson Imaging Devices Corporation  
and Epson Electronics America, Inc.*

*Also filed on behalf of AU Optronics  
Corporation and AU Optronics  
Corporation America, Chi Mei  
Corporation, Chimei Innolux Corporation,  
Chi Mei Optoelectronics USA, Inc., CMO  
Japan Co., Ltd., Nexgen Mediatech, Inc.  
and Nexgen Mediatech USA, Inc.,  
Chunghwa Picture Tubes, Ltd. and Tatung  
Company of America, Inc., HannStar  
Display Corporation, LG Display  
America, Inc. and LG Display Co., Ltd.,  
Philips Electronics North America  
Corporation, Samsung Electronics Co.,  
Ltd., Samsung Semiconductor, Inc., and  
Samsung Electronics America, Inc.,  
Samsung SDI Co., Ltd. and Samsung SDI  
America, Inc., and Sanyo Consumer  
Electronics Co., Ltd., Sharp Corporation  
and Sharp Electronics Corporation, and  
Toshiba Corporation, Toshiba Mobile  
Display Co., Ltd., Toshiba America  
Electronic Components, Inc. and Toshiba  
America Information Systems, Inc.*

JEFFREY H. HOWARD  
JEROME A. MURPHY  
JASON C. MURRAY  
JOSHUA C. STOKES  
CROWELL & MORING LLP

By: /s/ Jason C. Murray

JASON C. MURRAY

*Attorneys for Plaintiff  
Motorola Mobility, Inc.*

1 **Attestation:** I, Derek F. Foran, attest that concurrence in the filing of this document has been  
2 obtained from co-signatory Jason C. Murray.


3  
4 Dated: March 27, 2012

By: /s/ Derek F. Foran

5  
6  
7 **[PROPOSED ORDER]**

8  
9 Pursuant to the Parties' stipulation set forth above, IT IS SO ORDERED.

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11  
12 Dated: 3/27/12

13   
14 Hon. Susan Illston  
15 United States District Judge  
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